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UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re  
Deep Photonics Corporation,  
Debtor.

Case No. 12-35626-tmb11

**DEBTOR'S MOTION TO CONVERT**

Pursuant to 11 USC § 1112(a), Deep Photonics Corporation moves this Court to convert the above-referenced bankruptcy case to a case under Chapter 7 of Title 11 of the United States Code.

Debtor, its secured lender, and all parties that previously sought to have the above-referenced case dismissed, or in the alternative, converted, agree that it is in the best

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1 interest of Debtor, its creditors, and its estate to convert Debtor's bankruptcy case from a  
2 Chapter 11 reorganization to a Chapter 7 liquidation.

3 DATED this 16th day of October, 2013.

4 TONKON TORP <sup>LLP</sup>

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6 By /s/ Ava L. Schoen

7 Timothy J. Conway, OSB No. 851752

8 Ava L. Schoen, OSB No. 044072

9 Attorneys for Debtor  
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEBTOR'S MOTION TO CONVERT** on the following parties by electronic means through the Court's Case Management/Electronic Case File system on the date set forth below.

**ECF PARTICIPANTS**

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DATED this 16th day of October, 2013.

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By /s/ Ava L. Schoen

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